

Kent Ries
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COUNSEL FOR TRUSTEE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

IN RE:	§	
	§	
MICHAEL STEPHEN GALMOR,	§	CASE NO. 18-20209-RLJ-7
	§	
Debtor.	§	
	§	
And	§	
	§	
GALMOR'S/G&G STEAM SERVICE, INC.,	§	CASE NO. 18-20210-RLJ-7
	§	
Debtor.	§	
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KENT RIES, TRUSTEE,	§	
	§	
Plaintiff,	§	
	§	
v.	§	ADVERSARY NO. _____
	§	
GALMOR FAMILY LIMITED PARTNERSHIP,	§	
	§	
Defendant.	§	

ORIGINAL COMPLAINT

TO THE HONORABLE ROBERT L. JONES, BANKRUPTCY JUDGE:

Kent Ries, Trustee in these two bankruptcy cases ("Trustee"), complains against Defendant, Galmor Family Limited Partnership as follows:

**I.
BACKGROUND & PROCEDURE**

1. This Adversary Proceeding has been severed from Adversary Proceeding No. 19-2006 previously filed in this Court. The Trustee may file an amended complaint, including adding additional parties as necessary, within thirty (30) days of the filing of this Original Complaint in the new Adversary Proceeding.

2. Defendant, Galmor Family Limited Partnership (“FLP”), is a limited partnership, which is represented by Davor Rukavina of Numsch, Hardt, Kopf & Harr. The FLP timely filed its Answer in the original Adversary Proceeding, which may be modified and filed in this Adversary Proceeding by its counsel within sixty (60) days of the filing of this Original Complaint in the new Adversary Proceeding.

3. This is a core proceeding under 28 U.S.C. §157(b)(2)(A)&(O). This is an Adversary Proceeding under Bankruptcy Rule 7001(1). The parties have consented to this Court’s jurisdiction of a final order or judgment to the claims asserted herein.

4. Debtors filed for relief under Chapter 11 of the United States Bankruptcy Code on June 19, 2018 and converted to Chapter 7 cases on January 8, 2019. Kent Ries was subsequently appointed and qualified to serve as the Trustee over the bankruptcy estates.

II.

RELEVANT FACTS

5. The FLP owns in excess of \$3,000,000.00 of real estate in the Texas panhandle. The FLP owes approximately \$600,000.00 secured by liens on some or all of the FLP assets. The FLP owes the bankruptcy estates approximately \$2,400,000.00 as an unsecured creditor, pursuant to the sworn bankruptcy schedules filed by the Debtors in their respective cases.

III.

SUIT ON DEBT

6. According to the sworn schedules of Michael Stephens Galmor, Schedule B, Number 30 the FLP is indebted to his bankruptcy Estate in the total amount of \$1,310,807.00.

7. According to the sworn schedules of Galmor's/G&G Steam Service, Inc., Schedule B, Number 74 the FLP is indebted to its bankruptcy Estate in the total amount of \$1,096,051.32.

8. The Trustee is entitled to a judgment for each respective Estate for these amounts owed. The Trustee is also entitled to legal fees, interest and court costs incurred in the collection of these debts.

9. Both sets of sworn schedules described above were signed under penalty of perjury by Michael Stephen Galmor. Michael Stephen Galmor was the only party who can speak on behalf of the FLP as its management at the time the above schedules were filed. Therefore, the Trustee asserts that the FLP is barred by principles of res judicata and collateral estoppel from disputing this debt owed to the bankruptcy Estates

WHEREFORE, PREMISES CONSIDERED, the Trustee, respectfully requests this Court grant relief consistent with the above claim, and for such other and further relief this Court deems is just and proper.

Respectfully submitted,

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By: /s/ Kent Ries
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